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7 *Attorneys for Defendant*
Nevada Gold Mines

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 JUAN ULLOA,
12
13 Plaintiff,
14 vs.
15 NEVADA GOLD MINES, a Delaware
Limited Liability Company,
16 Defendant.

CASE NO.: 3:21-cv-495-RCJ-CSD

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S DEADLINE TO
FILE RESPONSIVE PLEADING
(First Request)**

17 Defendant, Nevada Gold Mines, LLC ("Defendant" or "NGM"), by and through its counsel
18 of record, ANTHONY HALL and JONATHAN MCGUIRE of SIMONS HALL JOHNSTON, and
19 Plaintiff Juan Ulloa, ("Plaintiff") by and through his counsel of record, J.P. KEMP of KEMP &
20 KEMP, hereby stipulate and agree to extend the deadline for NGM to file its responsive pleading
21 to Plaintiff's First Amended Complaint. The response, currently due on April 1, 2022, will be
22 extended by two (2) weeks to and including **April 15, 2022**.

23 This is the parties first request for an extension for Defendant to respond to Plaintiff's First
24 Amended Complaint and is made in good faith and not for the purpose of delay.

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1 DATED: April 1, 2022

DATED: April 1, 2022

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3 KEMP & KEMP

SIMONS HALL JOHNSTON PC

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5 /s/ James P. Kemp, Esq.
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Attorneys for Defendant

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11
12 **ORDER**

13 **IT IS SO ORDERED.**

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15 Dated: April 4, 2022

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18 UNITED STATES MAGISTRATE JUDGE

SIMONS HALL JOHNSTON PC
690 Sierra Rose Drive
Reno, NV 89511
Phone: (775) 785-0088

CERTIFICATE OF SERVICE

I, Emily T. Woods, declare:

I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of Simons Hall Johnston PC. My business address is 690 Sierra Rose Dr., Reno, NV 89511. I am over the age of 18 years and not a party to this action.

On the below date, I served the foregoing document by causing it to be served via electronic service through the Court's CM ECF electronic filing system, addressed as follows:

JAMES P. KEMP, ESQ.
KEMP & KEMP
7435 W. Azure Dr., Suite 110
Las Vegas, NV 89130
jp@kemp-attorneys.com
Attorney for Plaintiff JUAN ULLOA

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on April 1, 2022.

/s/ Emily T. Woods
Employee of Simons Hall Johnston

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